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13 [Defense Counsel's information on next page]

14 **UNITED STATES DISTRICT COURT**

15 **CENTRAL DISTRICT OF CALIFORNIA**

17 PEDRO MORET, individually, on behalf  
18 of others similarly situated, and on behalf  
19 of the general public,

20 Plaintiff,

21 vs.

22 U.S. BANCORP, U.S. BANK, N.A., AND  
23 RED SKY RISK SERVICES, LLC, and  
24 DOES 1-10, inclusive  
Defendants.

Case No.: 5:18-cv-01612-AB-SP

**NOTICE OF JOINT MOTION  
FOR APPROVAL OF  
SETTLEMENT AGREEMENT  
AND CONDITIONAL  
CERTIFICATION OF AN FLSA  
COLLECTIVE ACTION FOR  
SETTLEMENT PURPOSES, AND  
PLAINTIFF'S REQUEST FOR  
ATTORNEYS' FEES**

**HEARING SCHEDULE**

25 DATE: September 13, 2019  
26 TIME: 10:00 a.m.  
CTRM.: 7B

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19 Attorneys for Defendants

20 U.S. BANCORP;

21 U.S. BANK NATIONAL ASSOCIATION; and

22 RED SKY RISK SERVICES, LLC

23 *Attorneys for Defendants U.S. Bancorp,*

24 *U.S. Bank National Association, and*

25 *Red Sky Risk Services, LLC*

1 **NOTICE OF JOINT MOTION FOR APPROVAL OF SETTLEMENT**  
2 **AGREEMENT AND CONDITIONAL CERTIFICAION OF FLSA**  
3 **COLLECTIVE ATION**  
4

5 PLEASE TAKE NOTICE that on September 13, 2019, at the United State  
6 District Court for the Central District, Courtroom 7B, Plaintiff Pedro Moret  
7 (collectively with the Opt-in Plaintiffs, “Plaintiffs”) and Defendants U.S. Bancorp  
8 U.S. Bank, N.A., and Red Sky Risk Services, LLC, (“Defendants”) will move this  
9 Court for an Order Granting the Parties’ Joint Motion for Approval of Settlement  
10 Agreement and Conditional Certification of the FLSA Collective Action for  
11 Settlement Purposes, and Plaintiffs’ Request for Attorneys’ Fees. The Parties  
12 jointly move this Court for an order as follows: (1) approving the FLSA Collective  
13 Action Settlement Agreement pursuant to section 216(b) of the Fair Labor  
14 Standards Act, (2) approving the manner and form of notice to be sent to the FLSA  
15 Collective, (3) approving the request for Service Awards pursuant to the Settlement  
16 Agreement, (4) approving the request for Attorneys’ Fees and Costs pursuant to the  
17 terms of the Settlement Agreement, (5) approving the PAGA payment as set forth  
18 in the Settlement Agreement, (6) approving the release of claims as specified in the  
19 Settlement Agreement as binding and effective, (7) dismissing Plaintiff’s Rule 23  
20 class claims under California law, and (8) directing that final judgment of dismissal  
21 be entered as between Plaintiffs and Defendants.  
22

23 This Motion is based on this Notice of Motion, the Memorandum of Points  
24 and Authorities attached to this Motion, the Declarations, their Exhibits, all  
25 pleadings and papers filed herein, the arguments of counsel, and any other matters  
26 properly before the Court.  
27  
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1  
2 DATED: August 12, 2019

DESAI LAW FIRM, P.C.

3  
4 By /s/ Aashish Y. Desai

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8 *Attorneys for Plaintiff Pedro Moret and*  
9 *Putative Class and Collective Action*  
10 *Members*

11 DATED: August 12, 2019

**WINSTON & STRAWN**

13 By: /s/ Emilie C. Woodhead

14 Joan B. Tucker Fife

15 Emilie C. Woodhead

16 *Attorney for Defendants*  
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